



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**MURIEL GOODE-TRUFANT**  
*Acting Corporation Counsel*

**Samantha Schonfeld**  
Phone: 212-356-2183  
Fax: 212-356-2019  
E-mail: [sschonfe@law.nyc.gov](mailto:sschonfe@law.nyc.gov)

## MEMO ENDORSED

July 10, 2024

**Via ECF**

Honorable Edgardo Ramos  
United States District Court for the  
Southern District of New York  
40 Foley Square, Courtroom 619  
New York, NY 10007

The request is granted. The City shall file its reply by July 26, 2024. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: July 10, 2024

New York, New York

**Re: Nunzio Calce et al., v. The City of New York**  
**Civil Action No. 1:21-8208 (ER)**

Dear Judge Ramos:

This Office represents Defendant, the City of New York, in the above-entitled action and submits this letter-motion pursuant to Rule 1E of Your Honor's Individual Practices in Civil Cases to request a 2-week extension of time, from July 12, 2024 to July 26, 2024, for Defendant to file its final reply in further support of its cross-motion for summary judgment and in opposition to Plaintiffs' motion for summary judgment. Over the past several days, I have reached out to Plaintiffs' counsel both by email and telephone to obtain his consent but have not received a response.

Defendant requests this 2-week extension due to unforeseen, work-related scheduling conflicts. This is Defendant's second request for an extension of time to submit its final reply in support of its cross-motion for summary judgment and in opposition to Plaintiff's motion for summary judgment. No other dates will be affected by this request.

Thank you for your time and consideration of this request.

Respectfully submitted,

*/s/ Samantha Schonfeld*

cc: All Counsel of Record (via ECF)